

To: Cool, Richard[Cool.Richard@epa.gov]
From: Lana.Davis@shell.com
Sent: Sat 5/30/2015 4:53:05 PM
Subject: Re: Please alert me if any breaking news, Thx

Hi Rick,

I think we've nailed down the 8th-9th for the rig visits. The 8th will be the Polar Pioneer and the 9th for the Discoverer. If anything changes I'll let you know but for now we're moving forward on those dates. I'll get you the LWIs for the Polar Pioneer on Monday.

Hope you're having a good weekend.
Lana

On May 29, 2015, at 2:04 PM, Cool, Richard <Cool.Richard@epa.gov> wrote:

Hi Lana:

I'm staying in tune. ☺ I leave about 3:55 today but will be working on Saturday, here at the office.

If you get any late breaking news today or on Saturday (before 3:00), please drop me an email so that I might see it in the next 24 hours.

Just trying to do some planning. Thanks. If we don't communicate, have a great weekend.

Rick

From: Lana.Davis@shell.com [<mailto:Lana.Davis@shell.com>]
Sent: Friday, May 29, 2015 10:59 AM
To: Cool, Richard
Subject: RE: Discoverer LWIs

Hi Rick,

I completely understand, we're all kind of in the same boat. I have Pete Nelson working on getting us a clear date and hopefully he'll have something for us soon- today would be nice. I apology for the inconvenience. Stay tuned.

Lana

From: Cool, Richard [<mailto:Cool.Richard@epa.gov>]
Sent: Friday, May 29, 2015 9:45 AM
To: Davis, Lana SEPCO-UAA/H/E
Subject: RE: Discoverer LWIs

Lana, thanks.

Can you give me a sense of the likelihood of any inspection occurring on any day next week?

I ask because my schedule is literally being held hostage by effort to accommodate the recons. It would be especially helpful to know if you can also rule out Tuesday and Wednesday, June 2-3, and then we can check in early next week to see if Thur/Friday June 4-5 are potentially in play.

I realize the moving pieces make it difficult but just trying to reduce the level of uncertainty if possible.

Thanks.

Rick

From: Lana.Davis@shell.com [<mailto:Lana.Davis@shell.com>]
Sent: Friday, May 29, 2015 10:25 AM
To: Cool, Richard
Subject: RE: Discoverer LWIs

Hi Rick,

Still no word on the exact date but we can assume June 1st won't be it. Still shooting for June 8-9th.

Hope you have a good weekend.

Lana

From: Cool, Richard [<mailto:Cool.Richard@epa.gov>]
Sent: Wednesday, May 27, 2015 5:46 AM
To: Davis, Lana SEPCO-UAA/H/E
Subject: RE: Discoverer LWIs

Lana, thanks. I will look them over this week.

Would you please let me know what's developing in terms of the recon inspection dates. I am OK with a shift to the week of June 8 if that works for you but would like as much advance warning as possible if it is Monday or Tuesday of next week.

Maybe a Thursday check-in?

Rick

From: Lana.Davis@shell.com [mailto:Lana.Davis@shell.com]
Sent: Tuesday, May 26, 2015 5:10 PM
To: Cool, Richard
Cc: UA-AK-Regulatory-admin-record@shell.com
Subject: Discoverer LWIs

Hi Rick,

Thanks for going over all your questions, misc items Friday with me. Per your request, attached are all the NPDES permit related LWIs for the Noble Discoverer. Due to the number and size of the documents I will be sending you the Transocean LWIs in a later e-mail. I believe most of your questions will be answered in the attached LWIs but if not, perhaps during our recon inspection you'll get more clarity on the whose and processes.

You'll also noticed I attached the M-I SWACO Master Spreadsheet so that you'll be able to see how they summarize their daily discharge information and submit to Shell Alaska Venture Environmental. The M-I Compliance Specialist take the sampling data from their field logs, as well as from various Nobles daily estimated discharges activity reports and they summarize the information and record it on the Master Spread sheet. Buddy and or Jeff could explain the process to you better than I but you did ask about seeing the Master Spreadsheet, so it has been included.

I did contact Noble about their SOPs and their operating, documentation procedures and their Environmental Compliance manual. Unfortunately, neither are ready for distribution as they are currently updating them to reflect the changes that have been done to the rig since 2012. I was assured they would be updated and for review prior to Discoverer getting into Dutch Harbor.

With respect to your deck drainage I talk with Buddy Brooks about your deck drainage / skimmer question see his response below:

The skimmer/surge tanks has 2 primary applications are listed below:

- The re-circ line from the OWS to skimmer tank allows us to run the OWS used to treat contaminated deck drainage without discharging until all tests and samples have been performed.
- Tank can also be used to store all fluid from the rig floor (instead of going to MPC). This would help if; we we're processing fluid from the storage tanks and didn't want to exceed the MPC's flow rate, repairing the MPC, or a massive deluge and the MPC couldn't keep up.

Also, fluids spilled on decks that don't drain into P3 or S3 and need to be processed will be pumped into the skimmer tank. Hopefully we will never use the skimmer tank for this but it's a contingency plan in the unlikely event deck drainage can't drain to the P3 or S3. We can also send MPC reject water to the skimmer tank if we ever had too. Buddy couldn't think of a scenario where they would need to do this but again, it's an option/contingency plan.

I talked with the Rig Superintends (Noble and Transocean) about a date for our recon inspection. It could be as early as June 1st but I'm checking to see if June 8th and 9th would work as those dates would work better for me. I'll keep you posted on the dates.

Hope you were able to get out and enjoy some of the Memorial Day weekend. I did manage to take the weekend off.

Regards,

Lana Davis

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Lana.davis@shell.com

Thank you for this morning's discussion on these items. I appreciate your time and the additional clarifying information.

Per that discussion and as a follow-up, would you please forward copies of (1) all Local Work Instructions for the Discoverer and Polar Pioneer that are related, directly or indirectly, to the NPDES permit, including the Polar Pioneer's LWI for Zero Discharge of Muds/Cuttings and (2) the NPDES Master Spreadsheet template?

In addition and related to the Discoverer, items 3 and 5 below, would you also forward copies of any Noble Discoverer SOPs, manual excerpts or written waste stream management procedures regarding deck drainage (including from the rig floor) and contaminated ballast water that will be used by Shell/Noble during 2015 drill season operations.

In regard to deck drainage, this request includes any Noble equipment descriptions and related Noble operating and documentation procedures used to manage deck

drainage identified in the Shell April 2015 Noble Discoverer BMP Plan. This request includes any equipment and system operating/record keeping procedures related to the BMP Plan Appendix A, schematic diagram for the deck drainage discharge and BMP Plan Sections 4.4.2 and 7.2 (e.g., holding tanks, multi-phase clarifier, skimmer/surge tank, overflow tank, oil water separator(s), oil content measuring devices [oil content meters, etc]).

If possible, I would appreciate receiving these documents in advance of the recon inspection so that I might have time to review the materials and be better prepared to discuss any follow-up questions during the inspection. In addition, if there is any time lapse in compiling the requested information, I would prefer that you send me what is available when it is available rather than delaying submission until all materials are compiled. I apologize if this preferred method creates more inconvenience but with the limited time before early June, I would appreciate getting materials as they become available in order to avoid getting jammed up just before the recon inspections.